Young Conaway Stargatt & Taylor, LLP

Rockefeller Center 1270 Avenue of the Americas Suite 2210 New York, NY 10020 Telephone: (212) 332-8840

Facsimile: (212) 332-8855

Matthew B. Lunn Justin P. Duda

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC.

Plaintiff,

v.

THE MELVIN N. LOCK TRUST,

THE SYLVIA W. LOCK DECLARATION OF TRUST, DATED APRIL 13, 1982,

THE ESTATE OF SYLVIA W. LOCK,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05410 (SMB)

NORTHERN TRUST, N.A., F/K/A NORTHERN TRUST BANK OF FLORIDA, N.A., a National Association, in its capacity as Personal Representative of the ESTATE OF SYLVIA W. LOCK, in its capacity as Trustee of THE SYLVIA W. LOCK DECLARATION OF TRUST, DATED APRIL 13, 1982, and in its capacity as Trustee of the MELVIN N. LOCK TRUST,

LORRAINE LOCK NOSWORTHY,

AMANDA GOLDBERG SYNDERMAN,

JEREMY GOLDBERG,

ELENA ELKIN,

JOSHUA ELKIN,

FREDERICK GOLDBERG,

ALYSSA GOLDBERG,

MEREDITH GOLDBERG,

JOAN ELKIN MADISON,

SUSAN SIEGAL,

PAMELA W. GOLDBERG, and

JAMES NOSWORTHY,

Defendants.

SIXTH CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE that on May 16, 2014, pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above-captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB) on November 10, 2010, a

01:16784272.1

Case Management Notice (the "<u>First Case Management Notice</u>") was filed in the above captioned adversary proceeding (the "Adversary Proceeding").

PLEASE TAKE FURTHER NOTICE that on June 30, 2014, pursuant to the Order, a Second Case Management Notice [Adv. Dkt. No. 53] was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that on September 10, 2014, pursuant to the Order, a Third Case Management Notice [Adv. Dkt. No. 55] was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that on October 31, 2014, pursuant to the Order, a Fourth Case Management Notice [Adv. Dkt. No. 58] was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that on January 13, 2015, pursuant to the Order, a Fifth Case Management Notice [Adv. Dkt. No. 59] was filed in the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order, the parties to the Adversary Proceeding, by and through their counsel, have agreed to an amendment to the dates set forth in the Third Case Management Notice and that the following deadlines are hereby made applicable to the Adversary Proceeding:

- 1. The Initial Disclosures shall be due: April 14, 2015
- 2. The Deadline for Service of Substantive Interrogatories shall be: May 14, 2015
- 3. Fact Discovery shall be completed by: August 7, 2015
- 4. The Disclosure of Case-in-Chief Expert Report(s) shall be due: October 8, 2015
- 5. The Disclosure of Rebuttal Expert Report(s) shall be due: November 9, 2015
- 6. The Deadline for Completion of Expert Discovery shall be: January 8, 2016
- 7. The Deadline to File a Notice of Mediation Referral shall be: February 8, 2016
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: February 22, 2016
- 9. The Deadline for Conclusion of Mediation shall be: April 22, 2016

01:16784272.1

Dated: March 11, 2015

YOUNG CONAWAY STARGATT & TAYLOR, LLP

By: /s/ Matthew B. Lunn By: /s

Matthew B. Lunn Justin P. Duda Rockefeller Center 1270 Avenue of the Americas, Suite 2210

New York, New York 10020 Telephone: (212) 332-8840 Facsimile: (212) 332-8855 Email: mlunn@ycst.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC

WARNER & SCHEUERMAN

By: <u>/s/ Jonathon D. Warner</u> Jonathon D. Warner

6 West 18th Street, 10th floor New York, NY 10011

Telephone: (212) 924-7111 Facsimile: (212) 924-6111

Email: jdwarner@warnerandscheuerman.com

Attorneys for Lorraine Lock Nosworthy, Amanda Goldberg Snyderman s/h/a Synderman, Jeremy Goldberg, Elena Elkin, Joshua Elkin, Frederick Goldberg, Alyssa Goldberg, Meredith Goldberg, Joan Elkin Madison, Susan Siegal, Pamela W. Goldberg and James Nosworthy

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ David A. Rosenzweig

David A. Rosenzweig David L. Barrack 666 Fifth Avenue New York, New York 10103-3198

Telephone: (212) 318-3400 Facsimile: (212) 318-3400

Email: <u>drosenzweig@fulbright.com</u> <u>dbarrack@fulbright.com</u>

Attorneys for Northern Trust, N.A., f/k/a
Northern Trust Bank of Florida, N.A., a
National Association, in Its Capacity as
Personal Representative of The Estate of
Sylvia W. Lock, in Its Capacity as Trustee of
the Sylvia W. Lock Declaration of Trust,
Dated April 13, 1982, and In Its Capacity as
Trustee of The Melvin N. Lock Trust

01:16784272.1 4